

**ORIGINAL****RECEIVED**

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554

DEC 12 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Petitions for Emergency Relief	)	CC Docket No. 95-155
Regarding Release of the 855 Toll Free Code	)	File No. NSD-L-00-249

**JOINT REQUEST FOR EXTENSION OF TIME**

In a Public Notice on the above-captioned matter, the Commission seeks the views of all interested parties on the issues raised in emergency petitions for relief filed by The Toll Free Number Coalition ("TFNC") and the Toll Free Commerce Coalition ("TTFCC") (collectively, "Petitioners"). The deadlines which the Commission has set for Comments and Reply Comments in this matter are, respectively, December 13, 2000 and December 20, 2000. For the reasons set forth below, pursuant to Section 1.46 of the Commission's rules, 47 C.F.R. § 1.46, TFNC and TTFCC jointly request a two-week extension of time for the filing of reply comments in this matter, to January 3, 2001.

TFNC and TTFCC respectfully submit that a brief extension of time is warranted in this matter to enable the parties to review, analyze and respond to fully the initial set of comments to be filed on December 13. Because of the technical nature of the issues raised in the emergency petitions, it is likely that the initial comments will be equally technical and require the detailed review of qualified IT personnel and consultants. This process is necessarily time-consuming. TFNC and TTFCC also anticipate that the Commission's Public Notice will elicit

No. of Copies rec'd  
List ABCDE

responses from a broad array of large and small Responsible Organizations, carriers, and toll-free number users. The one week period which the Public Notice allows for the preparation and submission of reply comments does not afford commenters, particularly smaller RespOrgs and toll-free service users whose resources are limited and whose emergency petitions are the basis for this proceeding, to respond thoroughly and accurately. Indeed, given the fact that the Commission's Public Notice does not require comments to serve TNFC or TTFCC, or to submit their comments electronically, filed comments may not be available for review by potential review commenters until the week after the December 13 deadline.<sup>1</sup>

The brief extension of time requested herein will also not adversely affect any parties. As TFNC and TTFCC have indicated in their emergency petitions, according to DSMI's own records several million spare toll-free numbers remain in the SMS/800 database, with an average growth per week for numbers in use of only 64,000. Based on these figures, by DSMI's own estimate, toll free number exhaustion will not occur until 2003.

---

<sup>1</sup> Pursuant to Section 1.4(h) of the Commission's rules, if a document is required to be served upon other parties by statute or Commission regulation and the document is in fact served by mail,

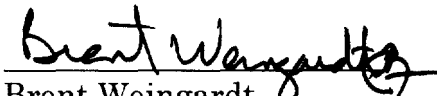
WHEREFORE, the Toll Free Number Coalition and the Toll Free Commerce Coalition respectfully request to the Commission to extend the deadline for filing Reply Comments in this matter to January 3, 2001.

Respectfully submitted,

THE TOLL FREE NUMBER COALITION

By:   
Eric Fishman  
Holland & Knight, LLP  
2100 Pennsylvania Avenue, NW  
4<sup>th</sup> Floor  
Washington, DC 20037  
(202) 828-1849  
efishman@hklaw.com

THE TOLL FREE COMMERCE COALITION

By:   
Brent Weingardt  
Bennet & Bennet  
1000 Vermont Avenue, NW  
10<sup>th</sup> Floor  
Washington, DC 20005  
(202) 371-1500  
bweingardt@bennetlaw.com

December 12, 2000

---

and the filing period for a response is 10 days or less, an additional 3 days (excluding holidays) will be allowed to all parties in the proceeding for filing a response.

## CERTIFICATE OF SERVICE

I, Eric Fishman, hereby certify that on December 12, 2000, copies of the attached Joint Request for Extension of Time were hand-delivered to the following persons at the addresses below unless otherwise indicated.

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

Hon. Gloria Tristani, Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Hon. Harold Furchtgott-Roth, Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dorothy Attwood, Chief  
Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Hon. William E. Kennard, Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Yog R. Varma  
Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Hon. Susan Ness, Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Martin Schwimmer, Network Services  
Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Hon. Michael K. Powell  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Diane Griffin Harmon, Deputy Chief  
Network Services Division  
Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Leslie J. Selzer  
Network Services Division  
Common Carrier Bureau  
Federal Communications Commission

L. Charles Keller, Chief  
Network Services Division  
Common Carrier Bureau  
Federal Communications Commission

Louise L. M. Tucker  
Senior Counsel-Washington  
Database Service Management, Inc.  
2020 K Street, NW, Suite 400  
Washington, DC 20006

Aaron M. Panner  
Kellogg, Huber, Hansen, Todd &  
Evans, PLLC  
Sumner Square  
1615 M Street, NW, Suite 400  
Washington, DC 20036

Brent Weingardt  
Bennet & Bennet, PLLC  
1000 Vermont Avenue, NW  
10<sup>th</sup> Floor  
Washington, DC 20005

ITS, Inc.  
1231 20<sup>th</sup> Street, NW  
Washington, DC 20036

Network Services Division  
Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 6-A207  
Washington, DC 20554

  
Eric Fishman

WAS1 #894577 v1